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April 14, 2015

BY ECF AND FEDERAL EXPRESS

Honorable Paul A. Crotty United States District Court Southern District of New York 500 Pearl Street, Chambers 1350 New York, New York 10007

Re:

Martinez v. The Mount Sinai Hospital

Docket No. 14-civ.-02548

Dear Judge Crotty:

On behalf of our client, The Mount Sinai Hospital ("Mount Sinai") and pursuant to the April 3 email from Mr. Marlon Ovalles, I write to submit a proposed summary judgment briefing schedule for the Court's approval. My colleague, Katherine D. Watson, consulted with Plaintiff's counsel who consents to the following: (i) Mount Sinai to file its moving brief on or before May 15; (ii) Plaintiff to file her opposition and/or cross-motion on or before June 12; (iii) Mount Sinai to file its reply and/or opposition on or before June 26; and (iv) Plaintiff to submit her reply on or before July 17.

Respectfully submitted,

Røry J. McEvøy

cc:

David Abrams, Esq. (via ECF)